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Attorney for Plaintiff  
Western Watersheds Project

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**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, SOUTHERN REGION OF THE CENTRAL DIVISION**

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WESTERN WATERSHEDS PROJECT,

Plaintiff,

v.

NATIONAL PARK SERVICE *et al.*,

Defendants,

STATE OF UTAH,

Defendant-Intervenor.

**Case No. 4:19-cv-00065-DN-PK**

**REQUEST TO SUBMIT CASE  
FOR DECISION**

Pursuant to DUCivR 7-3(b), Plaintiff Western Watersheds Project respectfully requests to submit the merits of this case for a decision by the Court. Plaintiff filed its opening brief on the merits on April 27, 2020, using the “Motion for Review of Agency Action” CM/ECF event. *See* ECF No. 60. Federal Defendants the National Park Service *et al.* filed their answer brief on the merits on June 18, 2020. *See* ECF No. 63. Defendant-Intervenor the State of Utah filed its

answer brief on the merits on June 29, 2020. *See* ECF No. 66. Plaintiff filed its reply brief on the merits on July 20, 2020. *See* ECF No. 69.

Plaintiff is eager to resolve the merits of its claims against Federal Defendants. No party has specifically requested a hearing, but if the Court would find it helpful, Plaintiff is willing to present the merits of its case through oral argument.

Plaintiff's counsel has conferred with counsel for Federal Defendants and the Defendant-Intervenor, and no party opposes this request to submit the merits of Plaintiff's case for a decision by the Court.

Respectfully submitted this 9th day of March, 2022.

/s/ John Persell

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 9, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which sent notification of such filing to all counsel of record.

/s/ John Persell

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